



REC'D TM
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August 14, 2000

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

RE: All Telephone Companies Tariff Filings Regarding Reclassification of Pay
Telephone Service as Required by FCC Docket 96-128
Docket No. 97-00409

Dear Mr. Waddell:

Attached please find an original and 13 copies of United Telephone-Southeast, Inc.'s responses to the First Set of Data Requests from Tennessee Payphone Owners' Association dated July 25, 2000 in the above docket.

Please address any questions to the attention of Laura Sykora at 919/554-7323 or me at 919/554-7587.

Sincerely,

James B. Wright

Attachments

C: Laura Sykora
Parties of Record (w/one enclosure)

POSTED
8/15/00

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on August 14, 2000 the foregoing document was served upon the following parties of record addressed as follows:

Richard Collier
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

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Nashville, TN 37238

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333 Commerce St., Suite 2101
Nashville, TN 37201-3300

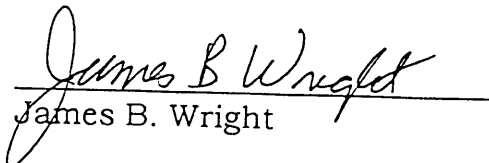
James P. Lamoureux
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1400 16th St., NW, #500
Washington, DC 20036


James B. Wright

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 1: For each rate element related to BellSouth's payphone access service, identify the following:

- a) the direct cost
- b) the shared (or joint) cost directly attributable to the rate element
- c) the level of common costs that BellSouth believes to be appropriate to be included in the rate

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 2: What categories of cost (e.g. shared, common, other) does BellSouth believe are appropriately included in the definition of "overhead costs" when applying the FCC's new services test?

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 3: What is BellSouth's definition of a "cost based rate"?

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 4: What is the maximum markup permitted above direct cost that is consistent with BellSouth's definition of a "cost based rate"?

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 5: What is the maximum markup permitted above the sum of direct, shared, and common cost that is consistent with BellSouth's definition of a "cost based rate"?

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 6: In previous state proceedings into the appropriate level of cost based rates for payphone access service, BellSouth has identified certain costs as "TELRIC Costs." Provide a complete definition of the term "TELRIC" as BellSouth intends it to be understood in this context, including a detailed description of the methodology used by BellSouth to develop these costs.

- a) Is the term "TELRIC" intended to mean only the direct costs associated with the rate element in question?
- b) Is the term "TELRIC" intended to mean the direct plus shared costs associated with the rate element in question?
- c) Is the term "TELRIC" intended to mean the direct plus shared plus common costs associated with the rate element in question?
- d) If the answer to a, b, and c above are no, provide a complete description of the categories of cost that are included in BellSouth's definition of TELRIC, and explain in detail why BellSouth believes that each category should be included.

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 7: Provide the following characteristics for local calls made on payphone access lines within BellSouth's Tennessee service territory:

- a) percentage of intra-office calls
- b) percentage of inter-office calls
- c) percent tandem transit
- d) average airline miles of transport for inter-office calls
- e) average calls per month per line
- f) average minutes per call per line

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 8: Provide BellSouth's most recent calculation of the following costs (including separately identified direct, shared, and common costs). Provide all supporting work papers and documentation.

- a) end office switching, per MOU
- b) end office trunk port, per MOU
- c) tandem switching per MOU
- d) tandem office trunk port, per MOU
- e) common transport per mile
- f) common transport termination

Response: United does not have BellSouth information available.

UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409

Request No. 9: Please state whether it is BellSouth's policy in Tennessee to provide payphone access lines to business addresses only, or whether BellSouth is willing to provide a payphone access line at a residential address.

Response: United does not have BellSouth information available.

**UNITED TELEPHONE-SOUTHEAST, INC.
RESPONSE TO TPOA DATA REQUEST
DATED 7/25/00
DOCKET NO. 97-00409**

Request No. 10: For each rate element related to UTSE's payphone access service, identify the cost of the element using the same methodology, assumptions, and TRA-ordered adjustments as found in the most recent cost study filed by BellSouth Telecommunications, Inc. in TRA docket no. 97-01262 (the UNE cost docket).

Response: United has not identified costs using the same methodology, assumptions, and TRA-ordered adjustments as found in the BellSouth UNE Cost Docket (No. 97-01262).